REMARKS

This amendment is in response to the office action mailed on October 20, 2005. Claim 14-23 are rejected under 35 USC103 (a) as being unpatentable over Brown (publication # USC2001/0043602 A1) in view of Angle et al (US Patent 5,857,196).

In response, applicants respectfully disagree with the Examiner and argue the claims are not obvious in view of the cited references for reasons set forth below. In order to support a rejection under 35 USC103 a prima facie case of obviousness must be established. To establish a prima facie case of obviousness, the prior art references when combined must teach or suggest all of the limitations of the claims. MPEP2143.

Claim 14 (the only independent claim) calls for "a direct table that stores a first address location for a search tree...wherein said direct table is one of said plurality of data structures that is first accessed in conducting the search".

It is applicants' contention that this limitation in applicants claim is not disclosed in the reference. Instead, US Patent 5,857,196 (reference relied on by the Examiner for teaching this element of applicants' claim) teaches a table (Figure 1A) for storing keys and in Figure 1B, a radix tree maps the keys stored in the table. The entries in the table does not point to address as the claim requires. Neither is the table access during a search since the key have already been mapped in the radix

tree (Fig. 1B). In conducting the search only the radix tree is accessed and not the table. (See Column 2, Lines 1-37 and Column 3, Lines 33-42). Since the limitation of applicants' claim identified above is not found in the combination of the references, a prima facie case of obviousness has not been established as is required. Therefore, the claims are not obvious in view of the teachings of the references.

In addition, applicants argue the reference teaches away from applicants' invention. It teaches a way in that the table is used in Angle et al for a different purpose than that for which it is used in the claims. As argued above and incorporated here in by reference in Angle, the table is used for storing keys (Column 2, Line 1-2) whereas in the claim the table is used for the purpose recited therein. Since the purpose for which the tables are used are different applicants' argue the different uses in the Angle et al is a "teach away" from the claimed invention. This "teach away" from is clear evidence of non-obviousness. Therefore, the claims are not obvious in view of the teachings of the references.

Furthermore, applicants argue the combination is improper in that there is no suggestion or motivation for combining these references. There is no motivation because as argued above and incorporated herein by references the purpose for which the tables are used in the reference and the claim invention is different. It is applicants' contention that different usage for the respective tables will lead an artician away from the claim invention rather than combining the references, without

hindsight based upon teaching in applicants' disclosure, in such a way that would render applicants' claim obvious.

Regarding the dependent Claims 15 thru 23, applicants' contend these claims are patentable due to their dependency on Claim 14. In addition, these claims are separately patentable in that they set forth specific features, not suggested or disclosed in the references, that make the search more efficient. It is applicants' contention that the different structure due to the limitation in these claims and the benefit of making the search more efficient are indicia of non-obviousness. As a consequence, these claims are patentable over the art of record.

It is believed the present amendment answers all the issues raised by the Examiner. Re-examination is hereby requested and an early allowance of all the claims is solicited.

Respectfully submitted,

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